

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEREK TUCSON, ROBIN SNYDER,
MONSIEREE DE CASTRO, and ERIK
MOYA-DELGADO,

Plaintiffs,

v.

CITY OF SEATTLE, ALEXANDER
PATTON, DYLAN NELSON, RYAN
KENNARD, and MICHELE LETIZIA,

Defendants.

CASE NO. C23-17 MJP

VERDICT FORM

VERDICT FORM

We the jury, provide the following answers to the questions submitted by the Court:

A. Questions Regarding Plaintiff Derek Tucson

Question 1: Has Plaintiff Derek Tucson proved his claim for Retaliatory Arrest (Federal
Claim No. 1) as to the following Defendants:

Answer:

Alexander Patton: yes (Yes or No)

Michele Letizia: yes (Yes or No)

After you answer Question 1, please answer Question 2.

Question 2: Has Plaintiff Derek Tucson proved his claim for Retaliatory Booking
(Federal Claim No. 2) as to the following Defendants:

Answer:

Ryan Kennard: yes (Yes or No)

Dylan Nelson: yes (Yes or No)

Alexander Patton: yes (Yes or No)

If you answer Yes to any part of Question 2, please answer Question 3. If you answer Yes to any part of Question 1, but No to all parts of Question 2, please skip Question 3 and answer Question 4. If you answer No to all parts of Questions 1 and 2, please skip Questions 3, 4, 5, 6, and 7, and answer Question 8.

Question 3: Has Plaintiff Derek Tucson proved his claim for Retaliatory Booking
(Federal Claim No. 3) as to Defendant City of Seattle?

Answer: yes (Yes or No)

If you answer Yes in response to any part of Questions 1, 2, and/or 3, please answer Question 4. If you answer No in response to all parts of Questions 1, 2, and 3, please skip Questions 4, 5, 6, and 7, and answer Question 8.

Question 4: If you answered Yes to any part of Questions 1, 2, and/or 3, what monetary amount will reasonably and fairly compensate Plaintiff Derek Tucson for the harm you find was caused by Defendant(s)'s conduct?

Amount of damages: \$ 20,000 (enter amount)

If you award damages in response to Question 4, please skip Question 5 and answer Question 6. If you award no damages in response to Question 4, please answer Question 5.

Question 5: If you answered Yes to any part of Questions 1, 2, and/or 3, but determined that Plaintiff Derek Tucson failed to prove he suffered damages caused by Defendant(s), you must award nominal damages not to exceed one dollar.

Amount of nominal damages (not to exceed \$1.00): \$ _____

After you answer Question 5, please answer Question 6.

Question 6: If you answered Yes to any part of Questions 1 or 2, do you also find that any of those Defendant(s) for whom you answered Yes acted with malice, reckless disregard, or oppression with respect to Plaintiff Derek Tucson's constitutional rights?

Answer:

Ryan Kennard: yes (Yes or No)

Dylan Nelson: yes (Yes or No)

Alexander Patton: yes (Yes or No)

Michele Letizia: yes (Yes or No)

If you answer Yes in response to any part of Question 6, please answer the part(s) of Question 7 that correspond to the Yes answer(s). If you answer No to all parts of Question 6, please skip Question 7 and answer Question 8.

Question 7: If you answered Yes to any part of Question 6, how much do you award Plaintiff Derek Tucson in punitive damages:

Ryan Kennard: \$ 60,000 (enter amount)

Dylan Nelson: \$ 7,500 (enter amount)

Alexander Patton: \$ ~~60,000~~ ^{22,500} (enter amount)

Michele Letizia: \$ ~~22,500~~ ^{60,000} (enter amount)

Please answer Question 8.

B. Questions Regarding Plaintiff Robin Snyder

Question 8: Has Plaintiff Robin Snyder proved her claim for Retaliatory Arrest (Federal Claim No. 1) as to the following Defendants:

Answer:

Dylan Nelson: yes (Yes or No)

Michele Letizia: yes (Yes or No)

After you answer Question 8, please answer Question 9.

Question 9: Has Plaintiff Robin Snyder proved her claim for Retaliatory Booking (Federal Claim No. 2) as to the following Defendants:

Answer:

Ryan Kennard: yes (Yes or No)

Alexander Patton: yes (Yes or No)

If you answer Yes to any part of Question 9, please answer Question 10. If you answer Yes to any part of Question 8, but No to all parts of Question 9, please skip Question 10 and answer Question 11. If you answer No to all parts of Questions 8 and 9, please skip Questions 10, 11, 12, 13, and 14, and answer Question 15.

Question 10: Has Plaintiff Robin Snyder proved her claim for Retaliatory Booking (Federal Claim No. 3) as to Defendant City of Seattle?

Answer: yes (Yes or No)

If you answer Yes in response to any part of Questions 8, 9, and/or 10, please answer Question 11. If you answer No in response to all parts of Questions 8, 9, and 10, please skip Questions 11, 12, 13, and 14, and answer Question 15.

Question 11: If you answered Yes to any part of Questions 8, 9, and/or 10, what monetary amount will reasonably and fairly compensate Plaintiff Robin Snyder for the harm you find was caused by Defendant(s)'s conduct?

Amount of damages: \$ 20,000 (enter amount)

If you award any damages in response to Question 11, please skip Question 12 and answer Question 13. If you award no damages in response to Question 11, please answer Question 12.

Question 12: If you answered Yes to any part of Questions 8, 9, and/or 10, but determined that Plaintiff Robin Snyder failed to prove she suffered damages caused by Defendant(s), you must award nominal damages not to exceed one dollar.

Amount of nominal damages (not to exceed \$1.00): \$ _____

After you answer Question 12, please answer Question 13.

Question 13: If you answered Yes to any part of Question 8 or Question 9, do you also find that any of those Defendant(s) for whom you answered Yes acted with malice, reckless disregard, or oppression with respect to Plaintiff Robin Snyder's constitutional rights?

Answer:

Ryan Kennard: yes (Yes or No)

Dylan Nelson: yes (Yes or No)

Alexander Patton: yes (Yes or No)

Michele Letizia: yes (Yes or No)

If you answer Yes in response to any part of Question 13, please answer the part(s) of Question 14 that correspond to the Yes answer(s). If you answer No to all parts of question 13, please skip Question 14 and answer Question 15.

Question 14: If you answered Yes to any part of Question 13, how much do you award Plaintiff Robin Snyder in punitive damages:

Ryan Kennard: \$ 60,000 (enter amount)

Dylan Nelson: \$ 22,500 (enter amount)

Alexander Patton: \$ 7,500 (enter amount)

Michele Letizia: \$ 60,000 (enter amount)

Please answer Question 15.

C. Questions Regarding Plaintiff Monsieree De Castro

Question 15: Has Plaintiff Monsieree De Castro proved her claim for Retaliatory Arrest (Federal Claim No. 1) as to the following Defendants:

Answer:

Dylan Nelson: yes (Yes or No)

Michele Letizia: yes (Yes or No)

After you answer Question 15, please answer Question 16.

Question 16: Has Plaintiff Monsieree De Castro proved her claim for Retaliatory Booking (Federal Claim No. 2) as to the following Defendants:

Answer:

Ryan Kennard: yes (Yes or No)

Alexander Patton: yes (Yes or No)

If you answer Yes to any part of Question 16, please answer Question 17. If you answer Yes to any part of Question 15, but No to all parts of Question 16, please skip Question 17 and answer Question 18. If you answer No to all parts of Questions 15, and 16, please skip Questions 17, 18, 19, 20, and 21, and answer Question 22.

Question 17: Has Plaintiff Monsieree De Castro proved her claim for Retaliatory Booking (Federal Claim No. 3) as to Defendant City of Seattle?

1 **Answer:** yes (Yes or No)

2 *If you answer Yes in response to any part of Questions 15, 16, and/or 17, please answer*
 3 *Question 18. If you answer No in response to all parts of Questions 15, 16, and 17, please skip*
 4 *Questions 18, 19, 20, and 21, and answer Question 22.*

5
 6 **Question 18:** If you answered Yes to any part of Questions 15, 16, and/or 17, what
 7 monetary amount will reasonably and fairly compensate Plaintiff Monsieree De Castro for the
 8 harm you find was caused by Defendant(s)'s conduct?

9 Amount of damages: \$ 20,000 (enter amount)

10 *If you awarded any damages in response to Question 18, please skip Question 19 and*
 11 *answer Question 20. If you award no damages in response to Question 18, please answer*
 12 *Question 19.*

13
 14 **Question 19:** If you answered Yes to any part of Questions 15, 16 and/or 17, but
 15 determined that Plaintiff Monsieree De Castro failed to prove she suffered damages caused by
 16 Defendant(s), you must award nominal damages not to exceed one dollar.

17 Amount of nominal damages (not to exceed \$1.00): \$ _____

18 *After you answer Question 19, please answer Question 20.*

19
 20 **Question 20:** If you answered Yes to any part of Question 15 or Question 16, do you also
 21 find that any of those Defendants for whom you answered Yes acted with malice, reckless
 22 disregard, or oppression with respect to Plaintiff Monsieree De Castro's constitutional rights?

23 **Answer:**

Ryan Kennard: yes (Yes or No)

Dylan Nelson: yes (Yes or No)

Alexander Patton: yes (Yes or No)

Michele Letizia: yes (Yes or No)

If you answer Yes in response to any part of Question 20, please answer the part(s) of Question 21 that correspond to the Yes answer(s). If you answer No to all parts of question 20, please skip Question 21 and answer Question 22.

Question 21: If you answered Yes to any part of Question 20, how much do you award Plaintiff Monsieree De Castro in punitive damages:

Ryan Kennard: \$ 60,000 (enter amount)

Dylan Nelson: \$ 22,500 (enter amount)

Alexander Patton: \$ 7,500 (enter amount)

Michele Letizia: \$ 60,000 (enter amount)

Please answer Question 22.

D. Questions Regarding Plaintiff Erik Moya-Delgado

Question 22: Has Plaintiff Erik Moya-Delgado proved his claim for Retaliatory Arrest (Federal Claim No. 1) as to the following Defendant:

Answer:

Michele Letizia: yes (Yes or No)

After you answer Question 22, please answer Question 23.

Question 23: Has Plaintiff Erik Moya-Delgado proved his claim for Retaliatory Booking (Federal Claim No. 2) as to the following Defendants:

Answer:

Ryan Kennard: yes (Yes or No)

Dylan Nelson: yes (Yes or No)

Alexander Patton: yes (Yes or No)

If you answer Yes to any part of Question 23, please answer Question 24. If you answer Yes to any part of Question 22, but No to all parts of Question 23, please skip Question 24 and answer Question 25. If you answer No to all parts of Questions 22 and 23, please skip the remaining Questions and sign and date this Verdict.

Question 24: Has Plaintiff Erik Moya-Delgado proved his claim for Retaliatory Booking (Federal Claim No. 3) as to Defendant City of Seattle?

Answer: yes (Yes or No)

If you answer Yes in response to any part of Questions 22, 23, and/or 24, please answer Question 25. If you answer No in response to all parts of Questions 22, 23, and 24, please skip the remaining Questions and sign and date this Verdict.

Question 25: If you answered Yes to any part of Questions 22, 23, and/or 24, what monetary amount will reasonably and fairly compensate Plaintiff Erik Moya-Delgado for the harm you find was caused by Defendant(s)'s conduct?

Amount of damages: \$ 20,000 (enter amount)

If you awarded any damages in response to Question 25, please skip Question 26 and answer Question 27. If you award no damages in response to Question 25, please answer Question 26.

Question 26: If you answered Yes to any part of Questions 22, 23, and/or 24, but determined that Plaintiff Erik Moya-Delgado failed to prove he suffered damages caused by Defendant(s), you must award nominal damages not to exceed one dollar.

Amount of nominal damages (not to exceed \$1.00): \$ _____

After you answer Question 26, please answer Question 27.

Question 27: If you answered Yes to any part of Question 22 or Question 23, do you also find that any of those Defendants for whom you answered Yes acted with malice, reckless disregard, or oppression with respect to Plaintiff Erik Moya-Delgado's constitutional rights?

Answer:

Ryan Kennard: yes (Yes or No)

Dylan Nelson: yes (Yes or No)

Alexander Patton: yes (Yes or No)

Michele Letizia: yes (Yes or No)

If you answer Yes in response to any part of Question 27, please answer the parts of Question 28 that correspond to the Yes answer(s). If you answer No to all parts of question 27, please skip the remaining question and sign and date this Verdict.

Question 28: If you answered Yes to any part of Question 27, how much do you award

Plaintiff Erik Moya-Delgado in punitive damages:

Ryan Kennard: \$ 60,000 (enter amount)

Dylan Nelson: \$ 15,000 (enter amount)

Alexander Patton: \$ 15,000 (enter amount)

Michele Letizia: \$ 60,000 (enter amount)

Presiding Juror, please sign and date this Verdict Form.

Date: 6/21/24

Sign: 

Presiding Juror